

FILED

JAN 15 2020

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD MORRISON,

Defendant.

No.

**4:20CR00039 SEP/NAB**

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**A. INTRODUCTION**

At all times material to this indictment:

1. Mutual Bank of Omaha and Regions Bank are financial institutions insured by the Federal Deposit Insurance Corporation.

**B. THE SCHEME TO DEFRAUD**

1. From in or about September 2018 through June 2019, in the Eastern District of Missouri, the defendant, **EDWARD MORRISON**, knowingly executed and attempted to execute a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of financial institutions insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises.

**C. MANNER AND MEANS OF THE SCHEME TO DEFRAUD**

It was a part of the scheme and artifice to defraud financial institutions and to obtain money under said financial institutions' custody and control by means of false and fraudulent pretenses, representations, and promises in order to deceive, that:

1. Defendant **Edward Morrison** would and did negotiate and execute checks drawn on checking accounts for two different businesses, knowing that the checks were either altered or counterfeit.
2. Defendant **Edward Morrison** would and did receive things of value, including a vehicle and cash, from the negotiation of such checks in St. Louis, Missouri.
3. Defendant **Edward Morrison** would and did fraudulently negotiate altered or counterfeit checks in St. Louis, Missouri.

**COUNT 1**  
(Bank Fraud)

1. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of Sections A, B and C of this Indictment.
2. In or about March, 2019, in the Eastern District of Missouri, the defendant,

**EDWARD MORRISON,**

for the purpose of executing the aforementioned scheme and artifice to defraud Mutual Bank of Omaha, and to obtain moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of Mutual Bank of Omaha, a financial institution insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, did knowingly and fraudulently deposit an altered check, drawn

on a Mutual Bank of Omaha account, in the amount of \$12,995.02, into his personal bank account, knowing full well that the check was altered.

In violation of Title 18, United States Code, Section 1344.

**COUNT 2**  
(Bank Fraud)

1. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of Sections A, B and C of this Indictment.
2. In or about September, 2018, in the Eastern District of Missouri, the defendant,

**EDWARD MORRISON,**

for the purpose of executing the aforementioned scheme and artifice to defraud Regions Bank, and to obtain moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of Regions Bank, a financial institution insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, did knowingly and fraudulently negotiate a counterfeit check, purportedly drawn on a Regions Bank account, in the amount of \$13,500.66, at Regions Bank in St. Louis, Missouri, knowing full well that the check was not genuine.

In violation of Title 18, United States Code, Section 1344.

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 982(a)(2), upon conviction of an offense in violation of Title 18, United States Code, Section 1344 as set forth in Counts 1 and 2, the defendant shall forfeit to the United States of America any property constituting, or derived

from, any proceeds obtained, directly or indirectly, as a result of said offense.

2. Subject to forfeiture is a sum of money equal to the total value of any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN,  
United States Attorney

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DIANE E.H. KLOCKE, #61670MO  
Special Assistant United States Attorney